

**FILED**

UNITED STATES DISTRICT COURT  
 ALBUQUERQUE, NEW MEXICO

for the  
 District of New Mexico

JUL 31 2015

Klt

**MATTHEW J. DYKMAN**  
 CLERK

In the Matter of the Search of  
 (Briefly describe the property to be searched  
 or identify the person by name and address)

2001 Chevy Silverado Truck  
 VIN: 1GCEK19T91E254281  
 New Mexico plate: KWR552

Case No.

15 mr 486

**APPLICATION FOR A SEARCH WARRANT**

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

2001 Chevy Silverado Truck, VIN: 1GCEK19T91E254281, New Mexico plate: KWR552 located at JRL Towing, 16 Ashcroft Avenue, Ramah, New Mexico

located in the \_\_\_\_\_ District of \_\_\_\_\_ New Mexico \_\_\_\_\_, there is now concealed (identify the person or describe the property to be seized):

2001 Chevy Silverado Truck, VIN: 1GCEK19T91E254281, New Mexico plate: KWR552 located at JRL Towing, 16 Ashcroft Avenue, Ramah, New Mexico

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☐ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section  
 18 USC 1112  
 18 USC 1153

Offense Description  
 Manslaughter  
 Offenses committed within Indian Country

The application is based on these facts:  
 See attached affidavit

- ☒ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

*[Signature]*  
 Applicant's signature

Jordan T. Hadfield, Special Agent  
 Printed name and title

Sworn to before me and signed in my presence.

Date: 7/31/15

*[Signature]*  
 Judge's signature

City and state: \_\_\_\_\_

Printed name and title

AFFIDAVIT IN SUPPORT OF

AN APPLICATION FOR A SEARCH WARRANT

I, the undersigned, being duly sworn, hereby depose and state as follows:

1. Your affiant, Jordan T. Hadfield, is a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and has been employed in that capacity since June 2012. Your affiant is currently assigned to the Albuquerque Division of the FBI, Intel-4 HUMINT Squad, and has primary responsibility for supporting and developing intelligence that assists in state and nationwide threat mitigation. In this regard, the following information was communicated to him by other sworn Law Enforcement Officers regarding the death of John Doe, a 23 year-old male, enrolled member of the Zuni Pueblo, by Darold R. ZunieFeathers (hereinafter ZunieFeathers), a 19 year-old male, enrolled member of the Zuni Pueblo, within the exterior boundaries of the Zuni Pueblo.
2. This investigation concerns an alleged violation of United States Code, 18 U.S.C. § 1112(a) and 1153(a), Involuntary Manslaughter in Indian Country.
3. Your affiant is aware that on 07/29/2015 at 6:11 AM, John Doe was pronounced dead at the Zuni Indian Hospital in Zuni, New Mexico. The Zuni Indian Hospital is located within the exterior boundaries of the Zuni Pueblo.
4. On 07/29/2015 at approximately 4:58 AM, Zuni Police Officers responded to Old Mission Drive, Zuni, New Mexico, a residence within the exterior boundaries of the Zuni Pueblo, and observed an individual, later identified as John Doe, lying in the driveway of the residence. John Doe was naked and had numerous abrasions and a severe head wound from which he was bleeding profusely. John Doe's mother, O.M., stated that early that morning she was awakened by a loud noise at the front of her residence and, through a window, observed a

male, later identified as ZunieFeathers, dragging John Doe across the driveway.

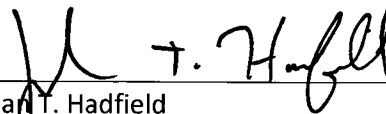
ZunieFeathers then drove away from the residence in a blue Chevy Silverado "double cab" truck with a black door on the driver's side.

5. After John Doe was pronounced dead, ZunieFeathers arrived at the Zuni Indian Hospital with his grandfather, C.Z. ZunieFeathers appears to be highly intoxicated and was "hyperventilating and behaving erratically." ZunieFeathers was wearing only one shoe.
6. Later that morning, Zuni Police Officers located a blue 2001 Chevy Silverado "double cab" truck with a black door on the driver's side, New Mexico license plate KWR552, VIN 1GCEK19T91E254281, abandoned in an arroyo approximately 6.2 miles south of 06 Old Mission Drive on Bureau of Indian Affairs (BIA) Route 41, a location within the exterior boundaries of the Zuni Pueblo. The truck is register to F.Z., father of ZunieFeathers.
7. The blue Chevy truck had a red substance on the side of the front driver's side tire, inside the front driver's side wheel well, and spattered along the bottom of the driver's side door.
8. Zuni Police Officers located one pair of black pants containing two cellular telephones and a wallet with the identification card of John Doe on a small dirt road off of BIA Route 41 about one-half mile from where the truck was located. Additionally, one shoe with a red substance on it was located on BIA 41. This shoe matched the single shoe that ZunieFeathers was wearing when he arrived at the hospital earlier.
9. It would be common for evidence sought in Attachment A, attached and incorporated herein, to be present on the exterior, inside, or near a vehicle that was used in a homicide death involving severe trauma to the victim.
10. Based on the forgoing, your affiant believes that evidence in the form of blood, saliva, hair, and/or other bodily fluids, trace evidence in the form of clothing and/or other fibers, latent fingerprint impressions, clothing items identifiable to John Doe or ZunieFeathers, weapons,

alcohol or alcoholic beverage containers, or substances capable of producing an altered mental state, may be on the exterior or inside the 2001 Chevy Silverado pickup bearing New Mexico license plate KWR552, currently stored at JRL Towing, 16 Ashcroft Avenue, Ramah, New Mexico, and that said evidence is relevant to the joint FBI/Zuni Police Department investigation into the death of John Doe and will aid in establishing probable cause regarding the facts, circumstances, cause and manner of the death of John Doe in the context of Title 18 U.S.C. § 1153 and 1112.

I declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

Respectfully submitted,

  
\_\_\_\_\_  
Jordan T. Hadfield  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me on July 31, 2015

  
\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Description of items to be searched for:

1. Any and all items that may retain evidence of bodily fluids (blood, saliva, perspiration, etc.) and human hair (scalp, public, etc.)
2. Any and all items that may retain evidence of clothing and/or other material fibers.
3. Any and all items that may retain evidence of latent fingerprint impressions.
4. Any and all items of indicia and/or property belonging to John Doe and Darold ZunieFeathers.
5. Any and all weapons, to include firearms and knives.
6. Any and all items that may retain evidence of alcohol or other substances capable of producing an altered mental state.
7. Any miscellaneous indicia and/or other items that may aid in establishing the facts, circumstances, cause and manner of the death of John Doe.